

UNITED STATES DISTRICT COURT

SEALEDfor the
District of Nebraska

United States of America

v.

Jose Guadalupe De La Torre

Case No. 8:25MJ238

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

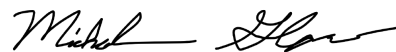
On or about the date(s) of 2/20/2025 to 4/3/2025 in the county of Douglas in the
District of Nebraska, the defendant(s) violated:*Code Section**Offense Description*

21:846

In the District of Nebraska and elsewhere, the defendant knowingly and intentionally combined, conspired, confederated and agreed with other persons known and unknown to the Grand Jury, to commit the following offense against the United States: to distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841 (a)(1) and 841(b)(1).

This criminal complaint is based on these facts:

See attached affidavit

☐ Continued on the attached sheet.*Complainant's signature*

Micheal Glover, DEA Special Agent

Printed name and title☐ Sworn to before me and signed in my presence.☒ Sworn to before me by telephone or other reliable
electronic means.Date: 4/11/2025*Judge's signature*City and state: Omaha, Nebraska

Ryan C. Carson, U.S. Magistrate Judge

Printed name and title

Micheal Glover, a Special Agent (SA) with the United States Drug Enforcement

Administration (DEA), being duly sworn, deposes and states:

1. I am authorized by the DEA as a Special Agent with authority to conduct investigations and arrests pursuant to violations of Title 21 and Title 18 of the United States Code (U.S.C.).
2. I am presently employed by the DEA and have been so employed since June 16, 2024. I am currently assigned to the Omaha Field Division Office charged with investigating drug trafficking and money laundering violations under Titles 18 and 21 of the United States Code. I have successfully completed the DEA Basic Agent's course, which involves the identification of controlled substances, methods of their importation, transportation, manufacture, distribution, and concealment that are utilized by violators of the controlled substance laws. During the course of my employment, I have participated in multiple controlled substance investigations. As a result of my training and experience, I have become familiar with the methods and techniques utilized by controlled substance violators to import, transport, manufacture, distribute, and conceal controlled substances.
3. As a Special Agent with the DEA, I have been involved in controlled purchases, mobile and stationary surveillance, and the execution of search warrants. As a result, I have been involved in the arrest of individuals for violating state and federal statutes regarding the possession, manufacture, and sale of controlled substances. I have participated in investigations involving the interception of wire communications and electronic communications obtained from cellular telephone devices. I am familiar with the ways in which drug traffickers conduct business, including, but not limited to, their methods of

importing and distributing controlled substances, their use of cellular telephones, and their use of code words to conduct their transactions.

4. The facts set forth in this affidavit are known to me as a result of my personal participation in this investigation and through conversations with investigators with the DEA and other law enforcement officers.
5. On February 20, 2025, law enforcement authorities with the Drug Enforcement Administration (DEA) Omaha Division Office conducted a controlled purchase operation in Omaha, Nebraska (NE), that resulted in the acquisition of approximately (1) gross pound of methamphetamine from a Hispanic male, who was later positively identified as Jose Guadalupe DE LA TORRE. During the controlled purchase transaction, DE LA TORRE utilized a white-in-color GMC Sierra truck (hereinafter referred to as the TARGET TRUCK) to conduct the methamphetamine transaction. Following the successful controlled purchase, DE LA TORRE (operating the TARGET TRUCK) traveled to the residence of 6209 H Street, Omaha, NE (TARGET RESIDENCE 1).
6. On February 27, 2025, the Honorable United States Magistrate Judge Michael D. Nelson, of the District of Nebraska, issued a federal court order authorizing the installation and monitorization of a Global Positioning System (GPS) Tracking Device for the TARGET TRUCK.
7. On March 3, 2025, DEA SA Brenna Dworek installed a GPS Tracking Device onto the TARGET VEHICLE in the driveway of TARGET RESIDENCE 1, as witnessed by SA Corey Kropp.
8. On March 13, 2025, law enforcement authorities with the DEA and Plattsmouth Police Department conducted surveillance on the TARGET TRUCK. On the same date, a traffic

stop was conducted and investigators were able to identify Jose Guadalupe DE LA TORRE (DOB: 07/07/1997) as the methamphetamine courier from the previous controlled purchase on February 20, 2025.

9. On March 26, 2025, law enforcement authorities with the DEA conducted a controlled purchase operation in Omaha, NE, that resulted in the acquisition of approximately 507 gross grams of suspected (field test positive) methamphetamine from DE LA TORRE. On the same date, investigators identified a second residence (via GPS tracking data and surveillance) of DE LA TORRE at 5011 S 38th Street, Omaha, NE (TARGET RESIDENCE 2).
10. On April 2, 2025, law enforcement authorities with the DEA and Omaha Police Department, conducted a joint-narcotics controlled purchase operation in Omaha, NE, that resulted in the acquisition of approximately (1) pound of (field test positive) methamphetamine from DE LA TORRE in the vicinity of TARGET RESIDENCE 2. On the same date, investigators observed DE LA TORRE depart the buy location, enter an international money-wire store, drive to and enter TARGET RESIDENCE 1, then return to and enter TARGET RESIDENCE 2.
11. On April 3, 2025, law enforcement authorities with the DEA and III-Corps Task Force executed two (2) State of Nebraska search warrants at the residences of DE LA TORRE at 5011 S 38th Street and 6209 H Street in Omaha, NE. Law enforcement seized approximately 8.85 kilograms of (field test positive) methamphetamine from 5011 S 38th Street in Omaha.
12. It is the affiant's belief that probable cause exists to arrest Jose Guadalupe DE LA TORRE for a violation of Title 21 U.S.C. § 841(a)(1), 841(b)(1), 846, Conspiracy to

Distribute and Possess with Intent to Distribute more than 500 grams of
methamphetamine between on or about February 20, 2025, and on or about April 3, 2025.

The affiant states the above statements are true and correct to the best of his knowledge,
information, and belief.

Micheal Glover

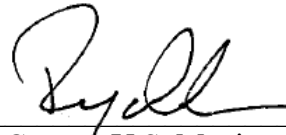


Special Agent, Drug Enforcement Administration

Sworn to before me by telephone or other reliable electronic means:

Date: April 11, 2025

City and State: Omaha, Nebraska



Ryan C. Carson, U.S. Magistrate Judge